Case:17-03283-LTS Doc#:14593 Filed:10/16/20 Entered:10/16/20 12:58:05 Desc: Main Document Page 1 of 73

#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

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In re:	:
	:
THE FINANCIAL OVERSIGHT AND	: PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	: Title III
	:
as representative of	: Case No. 17-BK-3283 (LTS)
•	:
THE COMMONWEALTH OF PUERTO RICO et al.,	: (Jointly Administered)
	:
Debtors. <sup>1</sup>	:
	X
	$\Lambda$

#### **CERTIFICATE OF SERVICE**

I, Winnie Wu, hereby certify that I am over the age of eighteen years old and employed by Paul Hastings LLP and that on October 14, 2020, I caused to be served the following document by sending a true and correct copy by e-mail on the parties listed on Exhibit A and by first class mail on the parties listed on Exhibit B. In addition, a true and correct copy of the following document was electronically served via the CM/ECF system on all counsel of record.

Objection of Official Committee of Unsecured Creditors to Joint Motion of PSA
 Creditors Pursuant to Section 312 of PROMESA and Section 105 of Bankruptcy Code to
 Impose Deadlines for Plan of Adjustment [Docket No. 14576].

Dated: October 16, 2020

<u>/s/Winnie Wu</u> Winnie Wu

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

#### EXHIBIT A Via E-mail

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Conjunta, et al, Civil Number K DP2001-1441								
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Davidson Kempner Distressed								
Opportunities International Ltd.,								
Davidson Kempner Institutional								
Partners, L.P., Davidson								
Kempner International, Ltd.,								
Davidson Kempner Partners,								
M.H. Davidson & Co., Gordel								
Capital Limited, Sculptor Credit								
Opportunities Master Fund, Ltd.								
(f/k/a OZ Credit Opportunities								
Master Fund, Ltd.), Sculptor								
Enhanced Master Fund, Ltd.								
(f/k/a OZ Enhanced Mater Fund,								
Ltd.), Sculptor GC Opportunities								
Master Fund, Ltd. (f/k/a OZ GC								
Opportunities Master Fund,								
Ltd.), Sculptor Capital LP (f/k/a								
OZ Management LP), Sculptor								
Master Fund, Ltd. (f/k/a OZ								
Master Fund, Ltd.), and Sculptor								
SC II, LP (f/k/a OZSC II								
L.P.),Canyon Balanced Master								
Fund, Ltd., Canyon Blue Credit								
Investment Fund L.P., Canyon								
Distressed Opportunity								
Investing Fund II, L.P., Canyon								
Distressed Opportunity Master								
Fund II, L.P., Canyon NZ-DOF								
Investing, L.P., Canyon Value								
Realization Fund, L.P., Canyon								
Value Realization MAC 18,								
Ltd., Canyon-ASP Fund, L.P.,								
Canyon-GRF Master Fund II,								
L.P., Canyon-SL Value Fund,								
L.P, EP Canyon LTD, and the								
Canyon Value Realization								
Master Fund, L.P.								
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Opportunities Fund (A), LLC,	i cinandez, ELC	1 CHIANGEZ IVIAITINEZ		Juncos	Juan		1750	andez.com
Appaloosa Management, LP,				Station				
Glendon Opportunities Fund,				Station				
LP, Mason Capital Management,								
LLC, Nokota Capital Master								
Fund, LP, Oaktree-Forrest								
Multi-Strategy, LLC (Series B),								
Oaktree Opportunities Fund IX								
(Parallel 2), LP, Oaktree Value								
Opportunities Fund, LP, Ocher								
Rose and SV Credit, LP,								
Andalusian Global Designated								
Activity Company, Glendon								
Opportunities Fund, L.P., Mason								
Capital Management, LLC,								
Nokota Capital Master Fund,								
L.P., Oaktree Opportunities								
Fund IX, L.P., and Mason								
Capital Master Fund LP,								
Counsel to ERS Bondholders								
Andalusian Global Designated								
Activity Company, Mason								
Capital Master Fund, LP, Ocher								
Rose, L.L.C., SV Credit, L.P.,								
Crown Managed Accounts for								
and on behalf of Crown/PW SP,								
LMA SPC for and on behalf of								
Map 98 Segregated Portfolio,								
Oceana Master Fund Ltd.,								
Pentwater Merger Arbitrage								
Master Fund Ltd., and PWCM								
Master Fund Ltd. Counsel to								
ERS Bondholders Glendon								
Opportunities Fund, L.P.,								
Oaktree-Forrest Multi-Strategy,								
LLC (Series B), Oaktree								
Opportunities Fund IX, L.P.,								
Oaktree Opportunities Fund IX								
(Parallel 2), L.P., and Oaktree								
Value Opportunities Fund, L.P.,								
Counsel to ERS Bondholders								
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Activity Company, Mason								

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Capital Master Fund, LP, Ocher								
Rose, L.L.C., SV Credit, L.P.,								
Crown Managed Accounts for								
and on behalf of Crown/PW SP;								
LMA SPC for and on behalf of								
Map 98 Segregated Portfolio,								
Oceana Master Fund Ltd.,								
Pentwater Merger Arbitrage								
Master Fund Ltd., and PWCM								
Master Fund Ltd., and I welvi								
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Highways & Transportation	Group, LLC			Blvd				
Authority and the Puerto Rico				Bivu				
Highways & Transportation								
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Cooperativa de Ahorro y Crédito								
Vega Alta, Cooperativa de						1		

Ahorro y Crédito Dr. Manuel								
Zeno Gandía, and Cooperativa de Ahorro y Crédito de Juana								
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Refunding Bonds (PBA Funds),							88
Black Rock Financial							
Management, Inc., Deutsche							
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Pacific Advisors, LLC, JNL							
Multi-Manager Alternative							
Fund, a Series of JNL Services							
Trust, Pelican Fund, LP, Silver							
Point Capital Fund, L.P., and							
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Master Fund, L.P., and co-							
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Constellation SPC Ltd., Acting							
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Puerto Rico SP, Emso Asset							
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Master Fund, L.P. and VR							
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Adversary Proceeding 19-00291							
and co-counsel to Defendant							
FPA Crescent Fund in							
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Fir Tree Capital Opportunity							
Master Fund III, LP; Fir Tree							
Capital Opportunity Master							
Fund, LP; Fir Tree Value Master							
Fund, LP; FPA Global							
Opportunity Fund, a Series of							
FPA Hawkeye Fund, LLC; FPA							
Hawkeye Fund, a Series of FPA							
Hawkeye Fund, LLC, FPA							
Select Fund, L.P.; FPA Value							
Partners Fund, a Series of FPA							
Hawkeye Fund, LLC; FT COF							
(E) Holdings, LLC; FT SOF IV							
Holdings, LLC; Global Flexible							
Fund, a sub-fund of Nedgroup							
Investment Funds PLC; Lannan							
Foundation; Litman Gregory							
Masters Alternative Strategies							

Fund, a series of Litman			
Gregory Funds Trust; Ulysses			
Offshore Fund, Ltd.; Ulysses			
Partners, LP; and VR Global			
Partners, LP; and VR Global			
Partners, LP in Adversary			
Proceeding 19-00295			

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Master Fund, LP, FPA Global								
Opportunity Fund, a Series of								
FPA Hawkeye Fund, LLC, FPA								
Hawkeye Fund, a Series of FPA								
Hawkeye Fund, LLC, FPA								
Select Fund, L.P., FPA Value								
Partners Fund, a Series of FPA								
Hawkeye Fund, LLC, FT COF								
(E) Holdings, LLC, FT SOF IV								
Holdings, LLC, Global Flexible								
Fund, a sub-fund of Nedgroup								
Investment Funds PLC, Lannan								
Foundation, Litman Gregory								
Masters Alternative Strategies								
Fund, a series of Litman								
Gregory Funds Trust, Ulysses								
Offshore Fund, Ltd., Ulysses								
Partners, LP, VR Global								
Partners, LP, VR Global Partners, LP, Candlewood								
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Advisory Services Ltd, FPA								
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Funds Trust, Black Rock								
Financial Management, Inc.,								
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Medical Applications of Puerto								
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Saatchi Inc., Destilerias						
Serralles, Inc., AmeriNational						
Community Services, LLC as						
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Recovery Authority, the						
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Capital Limited, Sculptor Credit	1						
Opportunities Master Fund, Ltd.							
(f/k/a OZ Credit Opportunities							
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Enhanced Master Fund, Ltd.							
(f/k/a OZ Enhanced Mater Fund,							
Ltd.), Sculptor GC Opportunities							
Master Fund, Ltd. (f/k/a OZ GC							
Opportunities Master Fund,							
Ltd.), Sculptor Capital LP (f/k/a							
OZ Management LP), Sculptor							
Master Fund, Ltd. (f/k/a OZ							
Master Fund, Ltd.), and Sculptor							
SC II, LP (f/k/a OZSC II							
L.P.),Canyon Balanced Master							
Fund, Ltd., Canyon Blue Credit							
Investment Fund L.P., Canyon							
Distressed Opportunity							
Investing Fund II, L.P., Canyon							
Distressed Opportunity Master							
Fund II, L.P., Canyon NZ-DOF							
Investing, L.P., Canyon Value							
Realization Fund, L.P., Canyon							
Value Realization MAC 18,							
Ltd., Canyon-ASP Fund, L.P.,							
Canyon-GRF Master Fund II,							
L.P., Canyon-SL Value Fund,							
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Bank Securities, Inc., First							
Pacific Advisors, LLC, JNL							
Multi-Manager Alternative							
Fund, a Series of JNL Services							
Trust, Pelican Fund, LP, Silver							
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Master Fund III, LP; Fir Tree							
Capital Opportunity Master							
Fund, LP; Fir Tree Value Master							
Fund, LP; FPA Global							
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FPA Hawkeye Fund, LLC; FPA							
Hawkeye Fund, a Series of FPA							
Hawkeye Fund, LLC, FPA							
Select Fund, L.P.; FPA Value							
Partners Fund, a Series of FPA							
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(E) Holdings, LLC; FT SOF IV							
Holdings, LLC; Global Flexible							
Fund, a sub-fund of Nedgroup							
Investment Funds PLC; Lannan							
Foundation; Litman Gregory							
Masters Alternative Strategies							

Fund, a series of Litman			
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Fund VI, Inc. UBS IRA Select								

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Proceeding 19-00034								
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Cantor-Katz Collateral Monitor LLC	The Collateral Monitor	Attn: Richard Katz	1915 Vallejo Street		San Francis co	CA	94123	rich.katz@torquepointllc.
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Proceeding 18-00081								
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#### EXHIBIT B Via First Class Mail

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Federal Agency	AmeriCorps	Attn: Kim Mansaray	1201 New York Ave., NW		Washington	DC	20525
Antilles Power Depot, Inc.	Antilles Power Depot, Inc.	Attn: Raymond Texidor	PO Box 810190		Carolina	PR	00981- 0190
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Defendant in Adversary Proceeding 19-00296	Banco Popular de Puerto Rico, as Trustee		Popular Fiduciary Services, Popular Center North Building	#209 Munoz Rivera, Ave, 2nd Level	Hato Rey	PR	00918
Defendant in Adversary Proceeding 19-00296	Bank of New York Mellon as PRIFA Indenture Trustee Pursuant to the Trust Agreement Dated as of March 1, 2015		225 Fifth Ave, Suite 1200		Pittsburgh	PA	15222
Defendant in Adversary Proceeding 19-00296	Candlewood Investment Group, LP		555 Theodore Fremd Avenue, Suite C-303		Rye	NY	10580
Counsel to Aida Rossy Clemente and Local Counsel to KDC Solar LLC	Carlos Alsina Batista Law Offices, PSC	Attn: Carlos C. Alsina Batista	638 Aldebaran St., #201		San Juan	PR	00920
Intervenor in Adversary Proceeding 17-00250	Cohen, Weiss and Simon LLP	Attn: Hiram M. Arnaud	900 Third Ave	21st Floor	New York	NY	10022
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Defendant in Adversary Proceeding 19-00296	Cooperativa De Ahorro Y Credito De Lares	Attn: Enrique M. Almeida Bernal, Esq.	PO Box 19757		San Juan	PR	00919
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Federal Agency	Department of Homeland Security (DHS)	Attn: Kirstjen M. Nielsen	245 Murray Lane., SW		Washington	DC	20528- 0075
Federal Agency	Department of Housing and Urban Development (HUD)	Attn: Ben Carson	451 7th Street., SW		Washington	DC	20410
Federal Agency	Department of Human and Health Services	Attn: Alex Azar	200 Independence Ave, SW		Washington	DC	20201
Federal Agency	Department of the Interior (DOI)	Attn: David Bernhardt	1849 C St., NW		Washington	DC	20240
Federal Agency	Department of Transportation (DOT)	Attn: Elaine L. Chao	1200 New Jersey Ave., SE		Washington	DC	20590
Federal Agency	Department of Veterans Affairs (VA)	Attn: Robert Wilkie	810 Vermont Ave., NW		Washington	DC	20420
Federal Agency	Economic and Statistics Administrations	c/o Bureau of Economic Analysis (BEA)	4600 Silver Hill Rd.		Washington	DC	20233
Federal Agency	Federal Communications Commission (FCC)	Attn: Ajit Pai	445 12th St., SW		Washington	DC	20554
Federal Agency	Federal Emergency Management Agency (FEMA)	Attn: Bob Fenton	500 C St., SW		Washington	DC	20472
Defendant in Adversary Proceeding 19-00296	Fir Tree Partners		55 West 46th Street, 29th Floor		New York	NY	10036
Defendant in Adversary Proceeding 19-00296	FPA Select Drawdown Fund L.P.		250 West 55th Street		New York	NY	10019
PBA Top 20 Creditor	G RG Engineering S E	Attn: President or General Counsel	Urb. Belisa 1515 Calle Bori		San Juan	PR	00927

Defendant in Adversary	Goldentree Asset		300 Park Avenue, 20th		New York	NY	10022
Proceeding 19-00296 Defendant	Management LP Ing. José F. Ortiz Vázquez	Director Ejecutivo de la Autoridad de Energía Eléctrica. S	Floor Avenida Ponce de León, Parada 17 ½, Edificio NEOS	Octavo Piso	Santurce	PR	00936- 4267
Integrand Assurance Company	Integrand Assurance Company	J.	PO Box 70128		San Juan	PR	00936- 8128
Defendant in Adversary Proceeding 19-00296	Ismael Vincenty Perez		Apt 6105 350 Via Aventura		Trujillo Alto	PR	00976
Counsel to PFZ Properties, Inc.	Jack Katz		ESJ Towers	6165 Isla Verde Ave	Carolina	PR	00979- 5729
Defendant in Adversary Proceeding 19-00296	Jaime B. Fuster Estate, Comprised By Maria J. Zalduondo Viera and Jaime and Maria L. Fuster Zalduondo		PO Box 363101		San Juan	PR	00936
Jaime Rodríguez Avilés	Jaime Rodríguez Avilés		P.O. Box 347		Yauco	PR	00698
The Board of Trustees of the Puerto Rico Electric Power Authority Employees' Retirement System, Juan Carlos Adrover, Sammy Ramírez and Alvin Román	Junta de Síndicos del Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica	Sistema de Retiro AEE	PO Box 13978		San Juan	PR	00908- 3978
Counsel to Kanoso Auto Sales Inc.	Kanoso Auto Sales Inc.	Attn: Jose A. Crespo Gonzalez, President	PO Box 1446		San German	PR	00683
Interested Party	Liberty Cablevision of Puerto Rico, LLC	Attn: Alexandra Verdiales	PO Box 192296		San Juan	PR	00919- 2296
Counsel to Cooperativa A/C, et.al	Marichal, Hernandez, Santiago & Juarbe, LLC	Attn: Rafael M. Santiago-Rosa & Vanessa Medina- Romero	Triple S Plaza, 1510 F.D. Roosevelt Ave.	9th Floor, Suite 9 B1	Guaynabo	PR	00968
Counsel to Metro Pavia Health System	Metro Pavia Health System	Attn: Zarel J Soto Acaba	PO Box 3180		Carolina	PR	00984
PBA Top 20 Creditor	Muniz Burgos Contractors, Corp.	Attn: President or General Counsel	Condominio Parque De Las Fuentes PH204	680 Calle Cesar Gonzalez	San Juan	PR	00918- 3912
Defendant in Adversary Proceeding 19-00296	Oppenheimerfunds Inc.		350 Linden Oaks		Rochester	NY	14625

Counsel to Pablo Del Valle Rivera and María A. Martínez, Tenants in Common and Fideicomiso Del Valle Martinez II	Pablo Del Valle Rivera		PO Box 2319		Тоа Ваја	PR	00951- 2319
Debtors	Puerto Rico Electric Power Authority	Attn: Office Of The General Counsel	PO Box 364267		San Juan	PR	00936- 4267
Members of Creditor's Committee	Puerto Rico Hospital Supply		Call Box 158		Carolina	PR	00986- 0158
Puerto Rico Industrial Development Company	Puerto Rico Industrial Development Company	Attn: Gabriel Maldonado	PO Box 362350		San Juan	PR	00936- 2350
PBA Top 20 Creditor	Quintero Construction S E	Attn: President or General Counsel	Carr 734 Km 0.5 Bo Arenas		Cidra	PR	00739
Defendant in Adversary Proceeding 19-00296	Reinaldo Vincenty Perez		917 Calle Isaura Arnau		San Juan	PR	00924
Reliable Equipment Corporation	Reliable Equipment Corporation	Attn: Marylin Del Valle, General Manager, Reliable Equipment Corporation	PO Box 2316		Toa Baja	PR	00951- 2316
Rene Pinto-Lugo, et al., Plaintiff in Adversary Proceeding 18- 00041	Rene Pinto-Lugo		PO Box 13531		San Juan	PR	00908
Ricardo Rosello Nevares, Defendant in Adversary Proceeding 17-00250 and 18- 00053	Ricardo Rosello Nevares	Through the Secretary of Justice	Calle Fortaleza #63		Viejo San Juan	PR	00901
Defendant in Adversary Proceeding 19-00296	Santander Asset Management, LLC		GAM Tower, 2nd Floor, 2 Tabonuco Street		Guaynabo	PR	06968
Federal Agency	Small Business Administration (SBA)	Attn: Linda McMahon	409 3rd St., SW		Washington	DC	20416
SOMOS, Inc.	SOMOS, Inc.		1605 Ponce De Leon Avenue	Suite 300, San Martin Bldg.	San Juan	PR	00909
Defendant in Adversary Proceeding 19-00296	Sucesion Francisco Xavier Gonzalez Goenaga		PO Box 364643		San Juan	PR	00936
Members of Creditor's Committee	The American Federation of Teachers (AFT)	Attn: Mark Richard	555 New Jersey Ave., NW	11th Floor	Washington	DC	20001

Debtors	The Commonwealth of Puerto Rico	Office of the Governor	La Fortaleza	63 Calle Fortaleza	San Juan	PR	00901
Unión de Médicos de la Corporación del Fondo del Seguro del Estado	Unión de Médicos de la Corporación del Fondo del Seguro del Estado	Governor	PO Box 70344, CMM33	Tortareza	San Juan	PR	00936- 8344
Members of Creditor's Committee	Unitech Engineering	Attn: Ramón Ortiz Carro	Urb Sabanera	40 Camino de la Cascada	Cidra	PR	00739
Federal Agency	US Army Corps of Engineers	Attn: Todd T. Semonite	441 G St., NW		Washington	DC	20548
Office of the United States Attorney for the District of Puerto Rico	US Attorney for the District of Puerto Rico	Attn: Rosa E. Rodriguez-Velez, U.S. Attorney	Torre Chardón, Suite 1201	350 Carlos Chardón Street	San Juan	PR	00918
Federal Agency	US Department of Agriculture	Attn: Sonny Perdue	1400 Independence Ave., SW		Washington	DC	20250
Federal Agency	US Department of Commerce	Attn: Wilbur Ross	1401 Constitution Ave., NW		Washington	DC	20230
Federal Agency	US Department of Education (ED)	Attn: Betsy DeVos	400 Maryland Ave., SW		Washington	DC	20202
Federal Agency	US Department of Health and Services	Attn: Amanda Barlow	330 C St., SW		Washington	DC	20201
Federal Agency	US Department of Justice (DOJ)	Attn: William Barr	950 Pennsylvania Ave., NW		Washington	DC	20530
Federal Agency	US Department of Labor (DOL)	Attn: Alexander R. Acosta	Office of the Solicitor, N-2700	Frances Perkins Building, 200 Constitution Ave	Washington	DC	20210
Defendants in Adversary Proceeding 19-00296: Whitebox Advisors LLC, Whitebox Asymmetric Partners, LP as Transferee of Syncora Guarantee Inc., Whitebox Caja Blance Fund, LP as Transferee of Syncora Guarantee Inc., Whitebox GT Fund, LP as Transferee of Syncora Guarantee Inc., Whitebox Multi-Strategy Partners, LP as Transferee of Syncora Guarantee Inc., and Pandora Select Partners, LP as	Whitebox Advisors, LLC	Attn: Scott Specken	3033 Excelsior Blvd., Suite 300		Minneapolis	MN	55416

Transferee of Syncora Guarantee				
Inc				